UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

IN RE: VALSARTAN PRODUCTS LIABILITY LITIGATION,

THIS DOCUMENT RELATES TO:

Economic Loss Plaintiff Miranda Dudley

MDL NO. 2875

HON. ROBERT B. KUGLER DISTRICT JUDGE

AMENDED NOTICE OF VIDEOTAPED DEPOSITION OF MIRANDA DUDLEY

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order #20, filed November 17, 2020 - Document 632), Defendants Teva Pharmaceuticals USA, Teva Pharmaceutical Industries Ltd., Actavis LLC, and Actavis Pharma, Inc. (collectively, "Teva") will take the deposition upon oral examination of Miranda Dudley, on **October 19, 2021, at 9:00 a.m. ET,** and continuing until completion, **via remote deposition**. The deposition will be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. Remote access using audio-visual conference technology will be available to permit counsel for the parties to participate from various, separate locations.

Additionally, in accordance with paragraph B(1) of C.M.O 20 (Dkt. 632), notice is hereby given that the undersigned will be the lead questioning attorney during the deposition.

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Date: September 30, 2021 Respectfully submitted,

/s/ Kate Wittlake

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E-mail: wittlakek@gtlaw.com

Attorney for Teva Pharmaceuticals USA, Inc., Teva Pharmaceutical Industries Ltd., Actavis LLC, and Actavis Pharma, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of September 2021, I caused a true and correct copy of the foregoing Amended Notice of Videotaped Deposition of Miranda Dudley to be filed with the Court's ECF system and served upon counsel of record. I further certify that a copy of the foregoing was served on the following Plaintiff's counsel e-mail at CGeddis@mazieslater.com, c.whiteley@kanner-law.com; d.stanoch@kannerlaw.com, with a copy served on all parties via MDL Centrality, on September 30, 2021. Per agreement by the parties, Plaintiff's counsel has agreed to serve a copy of the foregoing on Miranda Dudley via e-mail.

This 30th day of September 2021.

/s/ Kate Wittlake

Attorney for Teva Pharmaceuticals USA, Inc., Teva Pharmaceutical Industries Ltd., Actavis LLC, and Actavis Pharma, Inc.